

## Company Profile

Heffler Claims Group (“Heffler”) is a national leader in class action settlement administration, having specialized in the notice and administration of complex legal matters for more than 50 years. As the time-tested leader in our field, Heffler has processed millions of claims, mailed over tens of millions of notices, expedited hundreds of thousands of calls, and distributed billions of dollars in compensation to class members worldwide. This experience, coupled with our dedicated team of professionals and state-of-the-art technology, enables us to deliver a full-service notice and administration solution that allows for a seamless experience, case continuity, quality control, and cost savings.

Our in-house accountants have the unique ability to advise counsel regarding audit procedures and complicated distribution algorithms to accept claims, drafting plans of allocation, confirming the validity of claims and distributing the funds. Additionally, our tax professionals monitor the tax impact of transactions under IRC section 468(B).

As the only claims administrator to assign a partner to each case from start to finish, we provide clients with the practical knowledge needed throughout the administration process to proactively anticipate potential risks before they occur and recommend proven solutions to protect the interests of all stakeholders.

HF Media LLC, our in-house media company, is comprised of a nationally recognized team with more than 50 years of combined media and communication experience, spanning hundreds of court-approved legal notice programs. HF Media uses the top research, measurement and evaluation currency in the advertising industry, providing industry-accepted and legally defensible methods for research, demographics, targeting, and overall measurement. Led by Jeanne Finegan, APR, HF Media LLC consults with clients to provide notice strategy and evaluate media options to determine the most impactful and cost-effective means of reaching potential claimants and satisfying due process.

No other claims administrator provides the full scope of in-house services that Heffler offers. Some of the value-added services we provide clients include:

- ✓ **More than 50 Years in Business**
- ✓ **Dedicated Partner Assigned to Each Matter**
- ✓ **Industry leading technology platform**
- ✓ **24/7 Capability**
- ✓ **Onsite IT Team and Web Design**
- ✓ **In-house Tax Experts**
- ✓ **Efficient and Cost-Effective Solutions**
- ✓ **Demonstrated Accuracy**

- Elite Notice Expert
- Escrow Fund Services
- QSF & Fair Funds
- Auditing Services
- Tax Compliance Services
- Tax return preparation
- Form 1099 preparation and issuance
- Business Valuations
- Forensic Accounting
- Qui Tam Investigations
- Analysis and evaluation of incurred losses of claimants

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## The Heffler Difference

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At Heffler, our priority is to get it right for our clients and to deliver results. A question we constantly ask ourselves is “how can we be better?” It’s this philosophy that drives our business model and is the reason for our distinctive, consultative approach to each case. As a trusted leader in legal administration, our leadership team has collectively over 150 years’ experience in administering and managing many complex and sophisticated cases.

### Heffler by the numbers



### Why partner with Heffler?

- **The most experienced claims administration team in the industry.**  
Each member of our leadership team has more than 20 years of experience and is well-versed in all aspects of the settlement administration and notice process. They have a proven track record of consulting with both Plaintiff and Defense counsel, often before settlement agreements are finalized, to ensure a smooth, well-planned, and effective administration.
- **State-of-the-art-technology for both straightforward and complex class action cases.**  
Having worked on some of the most complex cases in the country, Heffler’s proprietary claims administration system, coupled with our in-house team of highly-skilled IT professionals — including web developers, programmers, and data specialists — was developed to allow us to handle any case with unlimited capacity and controlled security. Heffler invests in only the highest level of technology and data security which is critical to the successful housing of information and administration processes of class action settlements including the safety of class member personal information.
- **Recognized leader in media planning for class action, product recall and crisis outreach.**  
Through our full-service, in-house media team HF Media, Heffler offers superior outreach programs that are rooted in analytics, validated by third-parties and highly defensible in court. HF Media which is led by one of the industry’s most distinguished legal notice and communications experts, Jeanne Finegan, specializes in legal notice and has successfully planned and implemented hundreds of Court Approved notice programs, government enforcement actions and recalls, including some of the largest worldwide.



- **Complete in-house claims administration, settlement and distribution services.**

For decades, Heffler has assembled the in-house resources necessary for effective class action administration. Today, we're the only claims administrator to offer a complete, in-house team of US-based experts to handle any case from mediation through conclusion. With attorneys, CPAs, media and public relations experts, MBAs, and IT specialists, we provide our clients with a full-service notice and administration solution that allows for a seamless experience, case continuity, quality control, and cost savings.

- **Originator of industry-wide claims procedures with a proven track record.**

Heffler was the pioneer for administering class action settlements in the mid-1960's when demand for these services first emerged. Today, Heffler continues to hone its processes, that are tried and proven and used industry-wide, to further advance class action administration. Our leadership team remains at the forefront of the class action space by actively participating in panels and thought leadership initiatives, by serving on committees to help write and refine the rules, and by testifying in the Courts.

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## Representative Experience

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Heffler has successfully administered more than 400 sophisticated and high-profile securities matters related to all types of securities such as common stock, preferred stock, notes, bonds, ADRs, IPOs and put-and-call options. At Heffler, our advanced notification methods and our streamlined technology platforms enhance communication and performance for your securities and antitrust matters. Our team has the in-depth knowledge of the language and processes of the securities industry coupled with the practical experience needed to provide you with fast, secure and cost-effective claims processing and distribution in all manner of securities and antitrust class action cases.

Antitrust settlements can be difficult to navigate, involving high-stake fund calculations, complex plans of allocation, and multifaceted classes and settlement recoveries. Heffler has administered hundreds of antitrust matters, including some of the most complex and high-profile cases in US history, and distributed billions of dollars in settlement funds.

**Our leadership team, comprised of CPAs, attorneys, legal notice experts, and MBAs, has more than 200 years of collective industry experience.**

Unlike some administrators, Heffler eliminates the need to retain outside financial, tax, audit or accounting services. We offer a complete in-house claims administration, settlement and distribution solution from a team of US-based experts. Our CPAs and auditors have the unique ability to advise counsel regarding audit procedures and complicated distribution algorithms to accept claims, draft plans of allocation, confirm the validity of claims and distribute the funds. Additionally, our tax professionals monitor the tax impact of transactions under IRC section 468(B). Our unique blend of in-house expertise allows us to efficiently scale for all case types ranging in size and scope.





Please see the bios of the leadership team who will actively be involved with this matter should Heffler be selected in **Exhibit A** attached hereto. For the bios of additional team members and personnel at Heffler, please visit: [www.hefflerclaims.com/about/leadership-team](http://www.hefflerclaims.com/about/leadership-team).

## Representative Securities and Antitrust Experience

- *American Business Financial Services, Inc. Noteholders Litigation*, Master File No. 05-232, In the United States District Court for the Eastern District of Pennsylvania
- *Bank of America Corporation Securities Litigation*, Case No. 11-CV-00733-WHP, United States District Court for the Southern District of New York
- *Domestic Air Transportation Antitrust Litigation*, MDL No. 861, United States District Court Northern District of Georgia – Atlanta Division
- *In re Cigna Corporation Securities Litigation*, Case No. 2:02-cv-08088-MMB, United States District Court Eastern District of Pennsylvania
- *In re Longwei Petroleum Investment Holding Limited Securities Litigation*, Case No. No. 13 Civ. 214 (RMB), United States District Court for the Southern District of New York
- *In re Mavenir Systems, Inc. Stockholders Litigation*, C.A. No. 10757-VCP, Court of Chancery of the State of Delaware
- *In re OmniVision Technologies, Inc. Securities Litigation*, Case No. 5:11-cv-05235, United States District Court for the Northern District of California
- *In re The Bank of New York Mellon ADR FX Litigation*, Case No. 1:16-cv-00212, United States District Court for the Southern District of New York
- *In re: Currency Conversion Fee Antitrust Litigation*, MDL No. 1409 M 21-95, United States District Court for the Southern District of New York
- *In re: Domestic Drywall Antitrust Litigation*, MDL No. 2437 13-MD-2437, United States District Court, District of Pennsylvania, Eastern Division
- *In Re: NASDAQ Market-Makers Antitrust Litigation*, MDL No. 1023, United States District Court for the Southern District of New York
- *In Re: Packaged Ice Antitrust Litigation*, Case No. 08-MD-01952
- *KLA-Tencor Corporation*, Master Case No. 06-CV-04065 CRB, United States District Court for the Northern District of California – San Francisco Division

- *Merryman et al v. Citigroup, Inc., et al*, Case No. 1:15-cv-09185, United States District Court for the Southern District of New York
- *Merryman et al v. JP Morgan Chase Bank, N.A.*, Case No. 1:15-cv-09188, United States District Court for the Southern District of New York
- *Schering–Plough Corporation*, Master File No. 01-CV-0829(KSH/MF), United States District Court for the District of New Jersey
- *SEC v. Edwin Fujinaga, et al*, Case No. 15-16026, United States Court of Appeals for the Ninth Circuit
- *Simmons v. Spencer et al*, Case No. 1:13-cv-08216, United States District Court for the Southern District of New York
- *Takiguchi et al v. MRI International, Inc. et al*, Case No. 2:2013-cv-01183, United States District Court for the District of Nevada

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## Quality Control and Fraud Mitigation

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At Heffler an experienced partner, manager and senior staff member are assigned to all new cases. This team of professionals works with you every step of the way to ensure consistency and accuracy throughout the duration of the case. This core team ensures all the Policies, Procedures and Controls of Heffler are followed and confirms compliance with terms of the settlement agreement, the Notice, and other legal document terms and conditions throughout the administration process.

### Methods of Quality Assurance and Fraud Mitigation

At Heffler, we've established stringent quality assurance methods and procedures designed to establish controls over the accuracy of claims data. These built-in methods and procedures are incorporated during the entire administration process and prior to issuing a final report to verify the accuracy of recognized claim amounts, the implementation of the settlement's Plans of Allocation, and the validity of any approved claims along with the determination of deficient and rejected claims.

We generate Quality Assurance Reports wherein certain claims are identified for further review whether that be for identified anomalies, possible duplication of another claim, or claims filed by suspected or known fraudulent claim filers. Also, our supervisory staff conducts manual reviews for outlier claim groups and reviews them for assurance of the validity of the claims.

Heffler will conduct audits after consultation with the parties using statistical sampling techniques to validate the data collected or categories of claims that merit further review. Any abnormalities that are found or questions that arise from these audits are reviewed in detail.

Additionally, Heffler has identified, over the course of performing class action administration work, a list of persons known to file suspect claims or multiple claims to be paid in settlements, where their participation is questionable. In each matter we handle, prior to final approval of a claim, we verify that the claimant is not included in this list. We also audit for new claimants that might have questionable or unsubstantiated claims. Lastly, Heffler is in compliance with the U.S. Treasury's Office of Foreign Assets Control ("OFAC") regulations designed to halt terrorist and other illegal funds from circulation.

### Positive Pay Disbursements and ACH Debit Block

We require all disbursing banks to activate their "Payee Verification Positive Pay Disbursement" services for each distribution. This service safeguards against non-approved issuance of distribution checks and fraudulently altered distribution checks. Payee Positive Pay is a service offered by various banks that allows the check issuer/account holder to upload a file containing the check number, check amount and check date. As checks are then cleared against the account they will be matched against the positive pay file by the bank and if any checks presented against the account do not match to the positive pay file they will be queued as a "positive pay exception."

Heffler reviews all positive pay exceptions prior to approval of payment. To further protect an account against fraud, the disbursing bank electronically images all checks, allowing Heffler to track a check immediately should there be a questionable check presented for payment. All settlement distribution accounts are protected by ACH Debit block which prevents unauthorized attempts to pull funds from an account via the use of the routing and account number taken from a settlement check and using that information to make electronic payments.

### Data Security

Heffler takes great pride in our company-wide security processes and procedures. We consistently maintain a well-controlled and secure servicing environment to protect the confidentiality, integrity and availability of collected information. We make ongoing investments in people, processes and technology to ensure that our technology, communications, and security measures are up to speed with the latest developments and market demands.

In 2014, Heffler became AICPA SOC compliant, and Heffler is also HIPAA and PCI DSS compliant. While we are compliant with most, if not all, ISO27001 policies and procedures, Heffler has not completed the process for that certification.

Below we've outlined some of the key security measures that we have in place to safeguard our information as well the information of our clients and class members.

- ✓ **Industry-leading technology**
- ✓ **HIPAA Compliant**
- ✓ **PCI DSS Certified**
- ✓ **AICPA SOC Compliant**





- Heffler does not provide third-party access to client information; all data is secured within a hardened datacenter storage environment.
- Heffler enforces multiple policies surrounding data security and employee acknowledgement of sensitive materials including (but not limited to) the following: General HIPAA Compliance Policy, Privacy Policy, Document Policy/Document Retention Policy, HIPAA, Privacy, and Security Training Policy, Risk Analysis Policy, Security and Performance Monitoring Policy, Encryption and Key Management Policy, Incident Management and Notification Policy, Data Backup Policy, Business Continuity and Disaster Recovery Policy, Logical Security and Access Control Policy, Facility Physical Security and Access Control Policy, Acceptable Use Policy, Hardware and Media Accountability Policy, Audit Controls Policy, System and Information Integrity Policy, Mobile Device Policy, Security Planning Policy and Configuration Management Policy.
- All employees are trained and re-trained annually on HIPAA security and privacy, controls and spot checks are enforced to ensure PII-related materials are not left in the open nor disseminated to unauthorized parties.
- We have secure shred boxes throughout the office and all retired backup media and physical records are shredded by a certified third-party firm with certificates of destruction provided at the time of completion.
- Employees have read-only (least administrative) privileges to applications, data and file shares. Employees can only edit what they need to actively work on and have access to data they need for the project(s) assigned. Employees do not overlap in responsibility or across departmental functionality.
- Organizational units (OUs) are assigned and configured with specific security keys for encryption and file access to prevent unauthorized access and changes. Individual security rights are assigned within applications in addition to these measures.
- Data is stored in a climate-controlled datacenter with security cameras and restricted key access. We also have motion notification to IT personnel through the camera's alert system.
- We have periodic external control audits and assessments performed by third parties.
- Data transfers to and from Heffler are completed through a secure web portal with credentials issued only to the transmitting party. Data is retained until confirmed and then promptly removed from the portal and placed into an encrypted file share.
- System security includes desktops/laptops full-disk encryption, secure e-mail/secure FTP transfers, file share encryption, database encryption via 256 AES at rest and in transit, verified to FIPS 140-2 controls.
- Networks are restricted via segmented VLAN infrastructure to segregate production servers from external DMZ for websites, telecom, wireless (both guest and production) as well as test environments.
- We have multi-factor authentication in place for administrative accounts in IT.
- An intrusion prevention system (IPS) is in place on our forward-facing firewall to prevent unauthorized access to internal systems and data.
- Spam filters are in place with external link blocking to prevent malware/ransomware and phishing attempts.